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February 15, 2024

VIA ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 17A
New York, NY 10007

Re: Pierre v. City of New York, et al., No. 1:20-cv-05116-ALC-VF

Dear Judge Carter:

We represent Plaintiffs and write jointly with Defendant TD Bank N.A. to respectfully request a two-month extension of the deadline to file final approval papers.

The Settlement Administrator has issued settlement notices and claim forms to the approximately 5,500 class members. The deadline to submit claim forms has recently expired. However, per the parties' settlement agreement, additional time was provided to claimants who had special circumstances like being on military leave, having medical issues, not timely receiving the initial mailing, or other circumstances. The Settlement Administrator is now processing the all the claim forms.

Due to the sheer volume of class members and the number of forms received, the Settlement Administrator needs additional time to finish processing the forms, resolve any discrepancies, and conduct its verification protocols. Once completed, the Settlement Administrator will prepare a detailed report regarding the settlement which will be submitted to the Court and also used to prepare the final approval papers. The parties need additional time to allow the Settlement Administrator to complete its work.

As such, the parties respectfully request that the deadline to file the final approval papers be extended from February 19, 2024 to **April 19, 2024** and that the Fairness Hearing be adjourned from March 4, 2024 at 11am to **May 6, 2024** or for any date and time thereafter that is convenient for the Court.

This is the parties' second request for an extension of these deadlines. We thank the Court for its time and attention to this matter.

SO ORDERED:

 HON. ANDREW L. CARTER, JR.
 UNITED STATES DISTRICT JUDGE

cc: Counsel of Record (*via ECF*)

Dated: February 16, 2024

Respectfully submitted,

Innessa M. Huot